

# EXHIBIT D

Kevin Marsh

STATE OF SOUTH CAROLINA IN THE COURT OF  
COUNTY OF HAMPTON COMMON PLEAS

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RICHARD LIGHTSEY, LEBRIAN :  
CLECKLEY, PHILLIP COOPER, :  
ET AL., ON BEHALF OF THEMSELVES : CASE NO.  
AND ALL OTHERS SIMILARLY : 2017-CP-25-335  
SITUATED, :

Plaintiffs,

vs.

SOUTH CAROLINA ELECTRIC & GAS :  
COMPANY, A WHOLLY OWNED :  
SUBSIDIARY OF SCANA, SCANA :  
CORPORATION, AND THE STATE OF :  
SOUTH CAROLINA, :

Defendants,

SOUTH CAROLINA OFFICE OF :  
REGULATORY STAFF, :

Intervenor.

(Case Caption Continues on Page 2)

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VIDEOTAPED DEPOSITION OF KEVIN MARSH  
VOLUME 1

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DATE TAKEN: Monday, October 29, 2018

TIME BEGAN: 9:08 a.m.

TIME ENDED: 6:18 p.m.

LOCATION: WYCHE, P.A.  
44 East Camperdown Way  
Greenville, SC 29601

REPORTED BY: Karen Kidwell, RMR, CRR, CBC  
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P.O. Box 1459  
Columbia, South Carolina 29202  
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Kevin Marsh

1 on is: Did you agree with the -- with this attempt  
2 that -- to characterize SCANA's efforts as less than  
3 genuine?

4 A. I'm not sure I understand your question.

5 Q. Did you think SCANA was acting in a way,  
6 less than genuine, during its oversight of the  
7 project?

8 A. Absolutely not. We were open and honest,  
9 in my opinion, with all of our communications with  
10 Santee throughout the project. As they raised  
11 concerns, I believe our -- our nuclear construction  
12 team did their best to resolve those.

13 If it was something I could resolve with  
14 Lonnie, I certainly feel like I made every effort to  
15 do that.

16 Q. Okay. Did you discuss this letter with  
17 Mr. Carter after he -- or this document with  
18 Mr. Carter after he transmitted it to you?

19 A. I did. Lonnie and his team were scheduled  
20 to come have a meeting with me and some other nuclear  
21 project representatives, I believe it was, on a  
22 Thursday or Friday of the week I got this letter.

23 When Lonnie got there, I called Lonnie  
24 into my office and told him I was disappointed and  
25 surprised that I would get a letter like this from